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June 7, 2022

**VIA CM/ECF**

Magistrate Judge Steven Tiscione  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Zachary Solomon v. St. Joseph Hospital, et al.*  
Docket No.: 20-CV-03213

Dear Judge Tiscione:

Please allow the following to serve as a joint request by the parties to extend the time to file a discovery plan worksheet with proposed discovery deadlines until after the United States Court of Appeals for the Second Circuit rules on the appeal of this Court's September 29, 2021 Order, which denied defendants' motion to dismiss.

As stated in the attached notice, this appeal will be submitted to the Second Circuit for determination on June 15, 2022. Oral argument is not scheduled, and it is anticipated that a decision will follow soon thereafter. Thus, for purposes of efficiency, the parties respectfully ask that discovery be stayed until after the Second Circuit renders its determination regarding the dismissal of the Complaint.

We appreciate the court's attention to this matter.

Yours, etc.,

*Megan A. Lawless*

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cc: (via CM/ECF)  
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**United States Court of Appeals for the Second Circuit  
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**DEBRA ANN LIVINGSTON**  
CHIEF JUDGE

Date: April 20, 2022  
Docket #: 21-2729cv  
Short Title: Solomon v. St. Joseph Hospital

**CATHERINE O'HAGAN WOLFE**  
CLERK OF COURT

DC Docket #: 20-cv-3213  
DC Court: EDNY (CENTRAL  
ISLIP)  
DC Judge: Block  
DC Judge: Tiscione

**NOTICE OF SUBMISSION DATE  
FOR DETERMINATION OF APPEAL**

**Submission Date:** Wednesday, June 15, 2022

A motion or stipulation to withdraw with or without prejudice must be filed no later than 3 business days prior to the scheduled date of submission. The Court will consider the motion or stipulation at the time of submission, and counsel's appearance is not required. If a stipulation to withdraw with prejudice is based on a final settlement of the case, the fully-executed settlement must be reported immediately to the Calendar Team, and a copy of it must be attached to the stipulation.

Inquiries regarding this case may be directed to 212-857-8595.